

April 12, 2016

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Spire Global, Inc.
Satellite Bond Extension Request
File No. SAT-LOA-20151123-00078, Call Sign S2946

Dear Ms. Dortch:

On April 4, 2016, Spire Global, Inc. (“Spire”) submitted a request to the International Bureau (“Bureau”) seeking a waiver of the \$5,000,000 bond requirement¹ associated with the March 18, 2016 grant to Spire authorizing the deployment of four satellites from the International Space Station (“ISS”) and five satellites from the Cygnus payload, after it disengages from the ISS.² As an alternative to the grant of a waiver of the bond requirement, Spire requests that the Bureau grant a ninety-day extension to post the bond.³

The nine authorized satellites have been constructed already⁴ and are now on board the ISS.⁵ The satellites are expected to be deployed in May without any further action by Spire.⁶ Thus, grant of the

¹ See Letter to Marlene H. Dortch, Secretary, FCC, from Trey Hanbury, Counsel for Spire (April 4, 2016) (“Waiver Request”). Spire incorporates by reference the Waiver Request, including the supporting attachment to that document.

² See Stamp Grant, Spire Global, Inc., File No. SAT-LOA-20151123-00078 (granted Mar. 18, 2016 and corrected Mar. 24, 2016) (“Spire Grant”); see also Public Notice, Report No. SAT-01145 (Mar. 25, 2016).

³ See 47 C.F.R. § 1.3 (stating that the FCC may grant a waiver of its rules for good cause); see also *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

⁴ Accordingly, Spire has satisfied three of the FCC’s five milestone requirements. See 47 C.F.R. § 25.164(b).

⁵ See Waiver Request at 1.

⁶ Spire has requested a ninety-day extension to post the bond in the event there are unforeseen circumstances, beyond its control, resulting in the delay of the deployment of the satellites from the ISS or the Cygnus payload.

waiver would not undermine the purpose of the bond requirement, to ensure that licensees proceed with the construction and launch of their satellites in a timely manner.⁷ Moreover, requiring Spire to incur financial costs and expend other resources associated with posting a multi-million dollar bond, which will be unnecessary in several weeks, serves little purpose. If the Bureau does not grant or act on the request for waiver of the bond requirement, the Bureau should grant this request to extend the deadline for posting the bond, consistent with its precedent.⁸

Please contact the undersigned if you have any questions regarding this letter.

Respectfully submitted,

/s/ Trey Hanbury

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⁷ See *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Report and Order, 28 FCC Rcd 12403 ¶ 40 (2013).

⁸ See, e.g., Stamp Grant, Planet Labs, Request for Extension of Time, File No. SAT-MOD-20140321-00032 (granted August 11, 2014); Stamp Grant, New Skies Satellites B.V., Request for Extension of Time, File No. SAT-PPL-20110620-00112 (granted April 4, 2012); Stamp Grant, Intelsat North America LLC, Request for Extension of Time, File No. SAT-LOA-20100726-00167 (granted December 16, 2010).